Memorandum

Subject: Comments on the Supplemental Groundwater Tracing Summary Report and the draft Dioxin Reassessment at Arkwood, Inc. Superfund Site Risk Evaluation of Analytical Data from Decision Unit Sampling Report

To: Stephen Tzhone

From: Jon Rauscher

This memorandum provides comments on the Supplemental Groundwater Tracing Summary Report and the draft Dioxin Reassessment at Arkwood, Inc. Superfund Site Risk Evaluation of Analytical Data from Decision Unit Sampling Report.

Comments on the Supplemental Groundwater Tracing Summary Report:

1. Page 24, Section 4, Summary and Conclusions, important conclusion 1: The report states that "groundwater from the former sinkhole area on-Site only discharges from New Cricket Spring." The evidence from the tracer study support does support that the majority of groundwater is discharged from New Cricket Spring; however, low levels of dye were detected in Cricket Pond which indicates that some groundwater is following other pathways. Therefore, the absolute of New Cricket Spring being the only discharge point is not supported. The evidence does support the statement that a majority of the groundwater from the former sinkhole discharges from New Cricket Spring.

   The movement of a dye dissolved in water will differ from the movement of non-aqueous phase liquids through the epikarst and karst zones. Dense non-aqueous phase liquids (DNAPL) could a different groundwater pathways than the dyes dissolved in aqueous or water phase.

2. Page 24, Section 4, Summary and Conclusions, important conclusion 6: This conclusion trivializes the detections of low levels of introduced dyes in Cricket Pond. The detection of dyes in Cricket Pond indicates that other pathways from the sinkhole area are possible.

Comments on the draft Dioxin Reassessment at Arkwood, Inc. Superfund Site Risk Evaluation of Analytical Data from Decision Unit Sampling Report:

1. Page 5, Comparison to Soil Screening Levels: The last paragraph of this section should state that under potential future industrial worker conditions, the PCDD/F concentrations in surface soil at Decision Units 6 (uncapped area west) and 7 (railroad ditch) could pose a noncancer hazard.